

Exhibit A

**UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

TAWAINNA ANDERSON, Individually
and as Administratrix of the ESTATE
OF NYLAH ANDERSON, a deceased
minor,

Plaintiff,

vs.

TIKTOK INC. AND BYTEDANCE,
INC.,

Defendants.

Case No.: 2:22-cv-01849-PD

DECLARATION IN SUPPORT OF MOTION TO DISMISS

I, Brian O'Connor, hereby declare and state as follows:

1. I am over the age of 18 and I submit this declaration in support of the Motion to Dismiss filed by TikTok Inc. ("TTI") and ByteDance Inc. ("BDI") (collectively, "Defendants"). I am authorized to make these statements on behalf of Defendants. I have personal knowledge of each fact stated in this declaration (unless otherwise stated), and if called as a witness, I could and would competently and truthfully testify therein.

2. I am currently employed by TTI as the Head of HR, TikTok Operations & Corporate Functions, US. I have been employed by TTI since July 2021. The statements made in this declaration about Defendants are based on my personal

knowledge, corporate records maintained by Defendants in the ordinary course of business, and/or as a result of consulting with company employees. I also am familiar with and have access to Defendants' business records.

Overview of Defendants

3. TikTok Inc. is a California corporation with its principal place of business in Culver City, California.

4. ByteDance Inc. is a Delaware corporation with its principal place of business in Mountain View, California.

5. TTI and BDI are separate legal entities. TTI is a subsidiary of TikTok LLC. BDI is a subsidiary of ByteDance Ltd.

6. Neither have offices or registered agents in Pennsylvania. They also do not have any employees working in Pennsylvania. They do not maintain any servers in Pennsylvania.

7. TikTok is a video-sharing platform that millions of Americans use to create, share, and view short-form videos on their mobile devices. Users create, control, and upload the content of their videos on the TikTok platform.

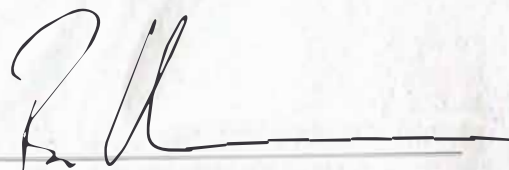
8. The TikTok platform is made available in the United States by TTI, and TTI operates and administers the platform from its current headquarters in California. The TikTok platform was not developed in Pennsylvania.

9. As of September 2021, TikTok had 1 billion monthly active users worldwide.

10. The TikTok platform has users in all 50 states.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed July 15, 2022 in Los Angeles, CA.

A handwritten signature in black ink, consisting of stylized initials followed by a horizontal line, positioned above a printed horizontal line.